To: Tyson, MaryPat[tyson.marypat@epa.gov]

From: McGrath, Jesse

Sent: Thur 11/6/2014 7:40:08 PM **Subject:** FW: Precision and Bias Checks

not responsive

From: Papp, Michael

Sent: Thursday, November 06, 2014 12:07 PM

To: McGrath, Jesse

Subject: RE: Precision and Bias Checks

Ex. 5 - Deliberative Process

These validation templates were developed by monitoring organizations for monitoring organization and since 2008 they identified critical criteria. There was consensus agreement with these.

not responsive

Below is an example of what we are seeing. this is from VA for ozone where the 1-point QC is 7%. The first time they got a -10.4

Ex. 5 - Deliberative Process

not responsive

seeing what's occurring below.

O₃ Assessments

ite ID: {Enter S	lite ID}	Pollutant type: O₃					CV _{ub} (%)			Bia
Meas Val (Y)	Audit Val (X)			d ²	[d]	d ²		Albah		Π
85.1	91.1	-6.586	-8.750	43.378	6.586	43.378	·			
81.6	91.1	-10.428	75th Percentile	108.745	10.428	108.745	n	Sa	S _{d2}	
83.4	92.4	-9.740	-5.262	94.873	9.740	94.873	15	4.557	52,464	
84	92.4	-9.091		82.645	9.091	82.645	n-1	Σd	Σd^2	
87.4	92.4	-5.411	ga ett til likkil set e år etter i killik i litt tit kildet i en enere er i kildik i likkil ette en en ette et	29.282	5.411	29.282	14	-103.151	1000.072	
78.4	92.4	-15.152	Outlier	229.568	15.152	229.568				
85.4	92.4	-7.576	ka katahilin a sema a sedil lera sema matula sedil di nahidi senera semu semila nita tadia dan	57.392	7.576	57.392	liganhar roadila	atti tihiliren ili tihtatta kta ilinema menmillilada ilinootoo oo oo oo oo		Γ
85.4	92.4	-7.576	Seattle (Milliannesse Millia (Milliannesse Milliannesse M	57.392	7.576	57.392		M00000		l
80.6	88	-8.409	periodrotrotrotrotrotromente da la lectrate l'Athibile comerci di det en l'Athibibitation da l'Assa	70.713	8.409	70.713		CV (%) (Eqn 2)		Γ
83.5	88	-5.114		26.149	5.114	26.149		6.11		l
83.5	88	-5.114		26.149	5.114	26.149				Ī
80.8	88	-8.182	aumon	66.942	8.182	66.942		Upper Probabilit	ty Limit	
81.5	88	-7.386		54.558	7.386	54.558		2.06		
93.5	88	6.250	Outlier	39.063	6.250	39.063				-
84.8	88	-3.636		13.223	3.636	13.223				4
15.000 10.000 5.000 0.000 -5.000 10.000	Perc	ent Diffi	erences							Marie and the second
20.000			—%D							

From: McGrath, Jesse

Sent: Thursday, November 06, 2014 12:44 PM To: Papp, Michael

Ex. 5 - Deliberative Process

Ex. 5 - Deliberative Process

Ex. 5 - Deliberative Process

From: Papp, Michael

Sent: Thursday, November 06, 2014 11:30 AM

To: McGrath, Jesse

Subject: RE: Precision and Bias Checks

That's what the guidance says

From: McGrath, Jesse

Sent: Thursday, November 06, 2014 11:57 AM

To: Papp, Michael

Subject: RE: Precision and Bias Checks

Are you interpreting that to mean that in the absence of any other cause the precision point alone is justification for invalidating the data?

From: Papp, Michael

Sent: Thursday, November 06, 2014 5:53 AM

To: McGrath, Jesse

Subject: Precision and Bias Checks

From the validation template

Observations that do not meet each and every criterion on the **Critical Criteria Table** should be invalidated unless there are compelling reason and justification for not doing so. The sample or group of samples for which one or more of these criteria are not met is invalid until proven otherwise. The cause of not operating in the acceptable range for each of the violated criteria must be investigated and minimized to reduce the likelihood that additional samples will be invalidated.

Any check listed as critical should be invalidated back to the last acceptable check. We may allow one check that just over the acceptance limit in but that's up to you.

The requirements are pretty clear. Some have abused this and now are paying the price.

Now there are other precision check (Like PM2.5 collocation) that represent a grander scale of precision for the PQAO that is not critical but operational. In this case you have more leeway to trouble shoot to determine issues.

A failure of an NPAP audit by itself would not be cause for invalidation but further follow-up. Hope this helps.

Mike Papp

EPA

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